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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Overcoming Obstacles to Telephone	)	BO Docket No. 99-11
Service for Indians on Reservations	)	DA 99-1010

COMMENTS OF AMSC SUBSIDIARY CORPORATION

AMSC Subsidiary Corporation ("AMSC") hereby submits its comments in the above-captioned proceeding concerning obstacles to telephone service for Indians on reservations. As a provider of Mobile Satellite Service ("MSS"), AMSC believes that it can make an important contribution to the development of crucial telecommunications services in Indian reservation areas.

AMSC was authorized in 1989 to construct, launch, and operate the first dedicated U.S. MSS system, as the culmination of a licensing process that began with the filing of applications in 1985.[1/] The first AMSC satellite was launched in 1995, and AMSC's SKYCELL Satellite Telephone Service began early in 1996. AMSC's satellite communications system covers the entire continental United States, including Alaska, Hawaii, Puerto Rico, and the U.S. Virgin Islands. AMSC's system provides voice and data communications services to people who live, work, or travel in rural and remote areas of the U.S. unserved by terrestrial technologies. AMSC's MSS system provides seamless coverage throughout these areas, without any natural service area borders or divisions. As the Commission has repeatedly stated, the public interest

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1/ Memorandum Opinion, Order and Authorization, 4 FCC Rcd 6041 (1989) (AMSC Authorization Order"); Final Decision on Remand, 7 FCC Rcd 266 (1992); *aff'd sub nom.* Aeronautical Radio, Inc. v. FCC, 983, F.2d 275 (D.C. Cir. 1993).

benefits from AMSC's system are quite significant, as it offers the ability to meet rural public safety needs, and provide emergency communications to any area during emergencies and natural disasters.[2/]

AMSC is particularly well-suited to provide key telecommunications services to Indian reservation areas, which are typically located in remote areas that cannot be served cost-effectively by traditional service providers. In contrast to terrestrial wireline and wireless technologies, AMSC can immediately provide services to these reservation areas, without the need to deploy costly facilities and infrastructure, such as towers or wires. The Commission recognizes the potential contribution of MSS providers, and recently emphasized in its 2 GHz proceeding that "[s]atellites are an excellent technology for delivering both basic and advanced telecommunication services to unserved, rural, and insular or economically isolated areas, including Native American communities . . ."[3/] AMSC is already working with Native American

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2/ *See* Notice of Proposed Rulemaking, Establishing Rules and Policies for the Use of Spectrum for Mobile Satellite Service in the Upper and Lower L-band, IB Docket No. 96-132, 11 FCC Rcd 11675, paras. 6-7, 16 (June 18, 1996).

3/ *See* Establishment of Policies and Service Rules for the Mobile Satellite Service in the 2 GHz Band, IB Docket No. 99-81, Notice of Proposed Rulemaking, para. 95 (rel. March 25, 1999).

communities toward this goal, and it is committed to continuing this important work to bring critical telecommunications services to these underserved areas.

Respectfully submitted,

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